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Attorneys for Chapter 7 Trustee,  
A. CISNEROS

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION

In re  
SHAMICKA LAWRENCE,  
Debtor.

Case No. 6:23-bk-15163-WJ

Chapter 7

NOTICE OF TRUSTEE'S MOTION TO  
ABANDON ESTATE'S INTEREST IN  
TANGIBLE PERSONAL PROPERTY  
ASSETS LOCATED AT 11364 ESTATES  
COURT, RIVERSIDE, CA 92503

[No Hearing Required Unless Requested Per  
Local Bankruptcy Rule 6007-1 and 9013-  
1(o)]

TO THE HONORABLE WAYNE E. JOHNSON, UNITED STATES BANKRUPTCY JUDGE,  
THE OFFICE OF THE UNITED STATES TRUSTEE AND ALL INTERESTED PARTIES:

PLEASE TAKE NOTICE that Arturo M. Cisneros, in his capacity as Chapter 7 Trustee  
("Trustee") of the Bankruptcy Estate ("Estate") of Shamicka Lawrence ("Debtor"), has filed a  
motion ("Motion") for an order authorizing the abandonment of the Estate's interest, if any, in  
certain personal property assets located at the residential real property at 11364 Estates Court,  
Riverside, CA 92503 ("Property"), pursuant to 11 U.S.C. § 554 and Rule 6007-1 of the Local  
Bankruptcy Rules ("LBR").<sup>1</sup>

Under Section 554(a), a trustee may abandon any property of the estate that is burdensome or  
that is of inconsequential value and benefit to the estate. Trustee has determined that the tangible  
personal property located at 11364 Estates Court, Riverside, CA 92503 ("Property") is of little or no

<sup>1</sup> All terms not defined herein are used as they are defined in the Motion.

1 value or benefit to the Estate or its creditors, to the extent explained herein (personal property does  
2 not include fixtures or the home theater items - which Debtor has agreed to leave at the Property  
3 irrespective of any arguments that such items are or are not fixtures). Trustee respectfully requests  
4 that the Court enter an order abandoning any and all interests of the Estate in the personal property  
5 assets located at the Property, with the exception of the items constituting the Property's home  
6 theater, and fixtures including the refrigerator and kitchen stove at the Property, which are built-in to  
7 the Property and cannot be removed.

8 Any party interested in obtaining a copy of the Motion which attaches a copy of the  
9 Agreement may contact Trustee's counsel, D. Edward Hays at [ehays@marshackhays.com](mailto:ehays@marshackhays.com) and Tinho  
10 Mang at [tmang@marshackhays.com](mailto:tmang@marshackhays.com). The Motion is based upon this Notice, the Declaration of  
11 Arturo M. Cisneros, and evidence as may be presented to the Court. If you do not oppose the Motion  
12 described above, then you need take no further action.

13 PLEASE TAKE FURTHER NOTICE that any response and request for hearing as to the  
14 proposed settlement must be in the form as required by Rule 9013-1(f) and (o) of the Local  
15 Bankruptcy Rules ("LBR") and filed with the Clerk of the above-entitled Court. The deadline for  
16 any response and request for hearing is 14 days after the date of service of this Notice plus an  
17 additional 3 days unless this Notice was served by personal delivery or posting as described in  
18 F.R.Civ.P. 5(b)(2)(A)-(B). A copy of any response or request for hearing must be served on  
19 Marshack Hays LLP to the attention of D. Edward Hays and Tinho Mang at the address indicated  
20 above and served on the Office of the United States Trustee, 3801 University Ave., Suite 720,  
21 Riverside, CA 92501. Failure to timely respond may be deemed as acceptance of the proposed  
22 compromise. *See* LBR 9013-1(h).

23  
24 DATED: May 7, 2024

MARSHACK HAYS WOOD LLP

25 By: /s/ Tinho Mang

26 D. EDWARD HAYS

27 TINHO MANG

Attorneys for Chapter 7 Trustee,

28 ARTURO M. CISNEROS

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **NOTICE OF TRUSTEE'S MOTION TO ABANDON ESTATE'S INTEREST IN TANGIBLE PERSONAL PROPERTY ASSETS LOCATED AT 11364 ESTATES COURT, RIVERSIDE, CA 92503** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **May 7, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**: On **May 7, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR**

SHAMICKA LAWRENCE  
11364 ESTATES COURT  
RIVERSIDE, CA 92503-0639

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **May 7, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA OVERNIGHT MAIL:**

HONORABLE WAYNE JOHNSON  
UNITED STATES BANKRUPTCY COURT  
3420 Twelfth Street, Suite 384 / Courtroom 304  
Riverside, CA 92501-3819

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 7, 2024  
Date

Chanel Mendoza  
Printed Name

/s/ Chanel Mendoza  
Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- **TRUSTEE: Arturo Cisneros (TR)** amctrustee@mclaw.org, acisneros@iq7technology.com;ecf.alert+Cisneros@titlexi.com
- **INTERESTED PARTY COURTESY NEF: Alan W Forsley** alan.forsley@flpllp.com, awf@fklawfirm.com,awf@fl-lawyers.net,addy@flpllp.com
- **ATTORNEY FOR LAWRENCE CHILDREN'S TRUST UTA MAY 6, 2014: Thomas M Geher** tmg@jmbm.com, bt@jmbm.com;tmg@ecf.courtdrive.com
- **ATTORNEY FOR INTERESTED PARTY MESSAGE ENFY FRANCHISING: Eric D Goldberg** eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- **ATTORNEY FOR TRUSTEE: D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR DEBTOR: Marc A Lieberman** marc.lieberman@flpllp.com, safa.saleem@flpllp.com,addy@flpllp.com
- **ATTORNEY FOR TRUSTEE: Tinh Mang** tmang@marshackhays.com, tmang@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cmendoza@ecf.courtdrive.com
- **U.S. TRUSTEE: United States Trustee (RS)** ustpregion16.rs.ecf@usdoj.gov

**2. SERVED BY UNITED STATES MAIL:**

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11801 PIERCE ST, SUITE 200  
RIVERSIDE, CA 92505-4400

**CO-DEBTOR**

COASTAL MESSAGE OXNARD, INC.  
ATTN: OFFICER, A MANAGING OR  
GENERAL AGENT, OR TO ANY  
OTHER AGENT AUTHORIZED BY  
APPOINTMENT OR LAW TO  
RECEIVE SERVICE OF PROCESS  
11801 PIERCE ST, SUITE 200  
RIVERSIDE, CA 92505-4400

**CO-DEBTOR**

FAITH PAGE LLC  
ATTN: OFFICER, A MANAGING OR  
GENERAL AGENT, OR TO ANY  
OTHER AGENT AUTHORIZED BY  
APPOINTMENT OR LAW TO  
RECEIVE SERVICE OF PROCESS  
11801 PIERCE ST, SUITE 200  
RIVERSIDE, CA 92505-4400

**CO-DEBTOR**

LAWRENCE GIRLS, LLC  
ATTN: OFFICER, A MANAGING OR  
GENERAL AGENT, OR TO ANY  
OTHER AGENT AUTHORIZED BY  
APPOINTMENT OR LAW TO  
RECEIVE SERVICE OF PROCESS  
11801 PIERCE ST, SUITE 200  
RIVERSIDE, CA 92505-4400



**CO-DEBTOR**

TRINITY FIFTEEN, LLC  
ATTN: OFFICER, A MANAGING OR  
GENERAL AGENT, OR TO ANY  
OTHER AGENT AUTHORIZED BY  
APPOINTMENT OR LAW TO  
RECEIVE SERVICE OF PROCESS  
11801 PIERCE ST, SUITE 200  
RIVERSIDE, CA 92505-5191

**CO-DEBTOR**

WEST COAST BABY, LLC  
ATTN: OFFICER, A MANAGING OR  
GENERAL AGENT, OR TO ANY OTHER  
AGENT AUTHORIZED BY  
APPOINTMENT OR LAW TO RECEIVE  
SERVICE OF PROCESS  
11801 PIERCE ST, SUITE 200  
RIVERSIDE, CA 92505-4400